Submission on the discussion paper – Going for Housing Growth

August 2025

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing construction material companies which produce an estimated 48 million tonnes of aggregate and quarried materials consumed in New Zealand each year.

Funded by its members, the AQA has a mandate to increase understanding of the need for aggregates to New Zealanders, improve our industry and users' technical knowledge of aggregates, and assist in developing a highly skilled workforce within a safe and sustainable work environment.

We make the following submission in relation to the discussion paper – Going for Housing Growth.

Providing for urban development in the new resource management system

We applaud the recent suite of changes to national direction proposed by the Government to improve infrastructure planning and delivery and enable good housing and urban development outcomes.

These changes should provide for faster and simpler approval of quarries and aggregate extraction activities necessary for the delivery of aggregates (including sand) to nationally and regionally significant projects. Aggregates and sand are on the Government's Critical Minerals List and form the foundation of every road and building, either directly or as part of materials such as concrete.

Additionally, as catastrophic events in recent years have highlighted, the impacts of climate change, including rising sea levels, will put added pressure on rock supply for sea walls, riverbank protection and restoration, and other climate adaptation solutions.

Quarry materials are not universally available and can only be sourced from where they are located (locationally constrained due to geology). Without a consenting pathway that provides for adequate access to resources at workable locations, there is the real risk of losing access to such proximate resources.

Design details of Going for Housing Growth

Future development strategies and spatial planning

We agree that spatial planning can identify and better integrate where and when future development capacity and infrastructure is expected to be provided, and support appropriate infrastructure project selection, which will provide confidence to the market about the future supply of developable land.

Infrastructure supporting activities, including quarrying activities, which are those activities that are independent of infrastructure but also necessary for infrastructure maintenance, upgrading and construction should be included in spatial planning requirements.

Spatial planning will also inform funding plans to improve integration of land use planning with infrastructure planning and investment. Work completed by GNS Science to identify future aggregate potential[1] will assist local government in their spatial planning around land use for infrastructure supporting activities.

Calculating development capacity

Planning for future housing growth cannot exist in isolation and needs to consider the supply of materials needed for infrastructure and housing development.

It is important that government set prescriptive rules and guidance for how councils calculate matters such as demand and development capacity. This needs to include the supply chain including the availability of proximate aggregate and sand resources.

Infrastructure capacity assessments should be based on modelling if possible, or to otherwise use a robust, transparent evidence-based approach. As mentioned above, data already exists nationally on aggregate opportunity and should be utilised in infrastructure capacity assessments.

Rural-urban boundaries

We support the proposal that the new resource management system is clear that councils are not able to include a policy, objective or rule that sets an urban limit or a rural-urban boundary line in their planning documents for the purposes of urban containment.

Quarrying is a highly productive use of land often on urban fringes. In most cases it is a temporary land use, with site restoration a critical element to ensure that land is available for future generations, including housing growth.

An important issue for quarries operating in areas of both urban and rural growth is reverse sensitivity. This occurs, when a new activity (i.e. residential) sensitive to the effects of another existing activity (i.e. quarrying) locates in close proximity to the existing activity. Complaints from the new activity lead to restrictions or cessation of the existing activity. This has the potential to sterilise future greenfield resources and severely restrict or lead to the closure of existing quarries. This in turn leads to quarries having to locate further from urban areas resulting in increased costs for more remotely sourced aggregate and lost opportunities for the local economy.

[1] Aggregate opportunity modelling – https://tewaihanga.govt.nz/our-work/research-insights/aggregate-opportunity-modelling-for-new-zealand

Spatial planning plays an important role in establishing land uses and setbacks should be considered between non-compatible developments to ensure urban growth and extractive industries can co-exist, as they are interdependent land uses.

General comments

These changes should provide for faster and simpler approval of quarries and aggregate extraction activities necessary for the delivery of aggregates (including sand) for infrastructure and housing development. Aggregates and sand are on the Government's Critical Minerals List and form the foundation of every road and building, either directly or as part of materials such as concrete.

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